

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF WEST VIRGINIA**

**IN RE: MONITRONICS
INTERNATIONAL, INC.,
TELEPHONE CONSUMER
PROTECTION ACT LITIGATION**

CASE NO. 1:13MD2493--JPB

THIS DOCUMENT RELATES TO: *ALL CASES*

**MOTION TO WITHDRAW AS COUNSEL
FOR ALLIANCE SECURITY, INC. and JASIT GOTRA**

Spilman Thomas & Battle, PLLC moves this Court for an Order permitting it and John R. Teare, Jr., Niall A. Paul and Christina S. Terek (collectively "Spilman Thomas & Battle") to withdraw from the representation of Alliance Security, Inc., and Jasit Gotra, (collectively "Alliance") in these civil actions.

As cause for this motion, Spilman Thomas & Battle, by the undersigned, provided Alliance with its Notice of Intent to Withdraw on October 23, 2018 and has informed Alliance that, if permitted to withdraw by the Court, Alliance will have the burden of keeping the Court informed where notice, pleadings, or other papers may be served; Alliance will have the obligation of hiring other counsel to serve as its counsel should these matters continue if/when the automatic stay in Bankruptcy is lifted; that the dates of any proceedings, including trial, and the holding of any such proceedings will not be affected by the withdrawal of counsel; and Alliance has a right to object to counsel's intent to withdraw. See Exhibit A.

Alliance has failed to meet its financial obligations to the firm and, due Spilman Thomas & Battle's status as an unsecured creditor in the ongoing Alliance Bankruptcy litigation

Spilman Thomas & Battle has an ongoing financial conflict of interest with continued representation.

WHEREFORE, the foregoing reasons, Niall A. Paul, John R. Teare, Jr. and Christina S. Terek and Spilman Thomas & Battle, PLLC, counsel for Alliance and its related entities in this civil action, respectfully move this Court for an Order granting the Motion to Withdraw as Counsel from the date following this Order.

BY SPILMAN THOMAS & BATTLE, PLLC

/s/ John R. Teare, Jr.

Niall A. Paul (WV Bar No. 5622)
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CERTIFICATE OF SERVICE

I hereby certify that on October 26, 2018, I electronically filed the foregoing *Motion to Withdraw as Counsel for Alliance Security, Inc. and Jasit Gotra* with the Clerk of the Court using the CM/ECF system, which will send notification of such filing to all current subscribers of the CM/ECF system, including:

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Defendants' Liaison Counsel AND
Counsel for Monitronics International, Inc.

And upon the following by U.S. Mail:

ALLIANCE SECURITY, INC.
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JASIT GOTRA
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/s/ John R. Teare, Jr.
John R. Teare, Jr. (WV Bar No. 5547)